

1 McGREGOR W. SCOTT
2 United States Attorney
3 R. STEVEN LAPHAM
4 PHILIP A. FERRARI
5 KENNETH J. MELIKIAN
6 Assistant U.S. Attorney
7 501 I Street, Suite 10-100
8 Sacramento, Ca. 95814
9 Telephone: (916) 554-2700

8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,) CR. NO. S-03-042 FCD
12 Plaintiff,)
13) STIPULATION; ORDER
14 SHANGO JAJA GREER, et. al.,)
15 Defendants.)

17 Defendant Shango Jaja Greer, through Peter Kmeto, Attorney At
18 Law, and the United States of America, through Assistant U.S.
19 Attorney Kenneth J. Melikian, agree to vacate the hearing on the
20 defendant's motion to dismiss scheduled for August 19, 2005. And,
21 Defendant Oscar Gonzales, through John T. Philipsborn, Attorney At
22 Law, and the United States of America, through Assistant U.S.
23 Attorney Kenneth J. Melikian, agree to vacate the hearing on the
24 defendant's motions to dismiss scheduled for August 19, 2005. The
25 parties further stipulate that said hearings be placed on the
26 court's September 19, 2005, calendar at 9:30 a.m. Co-defendants
27 who have joined these motions have agreed to these continuances
28 through their counsel.

1 Regarding defendant Shango Jaja Greer, the continuance is
2 being requested because the defendant's counsel will be unable to
3 attend the hearing currently scheduled for August 19th. Regarding
4 defendant Oscar Gonzales, the continuance is being requested
5 because the defendant and the government have been involved in
6 very serious plea negotiations, and would like to continue to
7 concentrate on these negotiations without the distraction that
8 would be caused by these motions.

9 It is agreed that the government will file any opposition to
10 defendant Gonzales' motions to dismiss by September 2, 2005.
11 Reply briefs from any defendant will be filed by September 12,
12 2005.

13 As motions remain pending in this case, time should remain
14 excluded through September 19, 2005, from computation under the
15 Speedy Trial Act pursuant to local code E (18 U.S.C. §
16 3161(h)(1)(F)).

17 | DATED: August 17, 2005

Very truly yours,

McGREGOR W. SCOTT
United States Attorney

/s/ Kenneth J. Melikian

By
KENNETH J. MELIKIAN
Assistant U.S. Attorney

24 | DATED: August 17, 2005

/s/ Kenneth J. Melikian
PETER KMETO
Attorney for Defendant Shango Jaja
Greer
(Signed by Kenneth J. Melikian per
authorization by Peter Kmeto)

1 DATED: August 17, 2005

/s/ Kenneth J. Melikian
2 JOHN T. PHILIPSBORN
3 Attorney for Defendant Oscar
4 Gonzales
(Signed by Kenneth J. Melikian per
5 authorization by John T.
6 Philipsborn)

7 DATED: August 17, 2005

/s/ Kenneth J. Melikian
8 JAN DAVID KAROWSKY
9 Attorney for Defendant Jason Keith
10 Walker
(Signed by Kenneth J. Melikian per
11 authorization by Jan David
12 Karowsky)

13 DATED: August 17, 2005

/s/ Kenneth J. Melikian
14 JESSE M. RIVERA
15 Attorney for Defendant Charles Lee
16 White
(Signed by Kenneth J. Melikian per
17 authorization by Jesse M. Rivera)

18 IT IS SO ORDERED.

19 DATED: August 17, 2005

/s/ Frank C. Damrell Jr.
20 HONORABLE FRANK C. DAMRELL JR.
21 U.S. District Court Judge

22

23

24

25

26

27

28